

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
SCURA, WIGFIELD, HEYER & STEVENS, LLP
JOHN J. SCURA III, ESQUIRE
1599 HAMBURG TURNPIKE
WAYNE, NJ 07470
(973)696-8391
Attorneys for Debtors

In Re:

Ronnye & Rina Hurtado,

Debtors.

Case No.: 10-48668 (DHS)

Chapter 7

Hearing Date:

**NOTICE OF MOTION OF DEBTORS TO REOPEN BANKRUPTCY CASE,
DISCHARGE DEBT AND FOR VIOLATION OF AUTOMATIC STAY AND AWARD OF
ATTORNEY FEES AND COSTS**

TO: ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that the undersigned will move before the United States Bankruptcy Court located at 50 Walnut Street in the Martin Luther King, Jr. Federal Building in Newark, New Jersey on April ___, 2014 at __:__am/pm or as soon thereafter as counsel may be heard for an Order permitting debtor to Re-open the above Chapter 7 Case, Discharge Debt and For Violation of the Automatic Stay and Award of Attorney Fees and Costs; and

PLEASE TAKE FURTHER NOTICE that oral argument is only requested if the motion is contested or so directed by the court; and

PLEASE TAKE FURTHER NOTICE that the undersigned will rely on the attached certification in support of the motion; and

PLEASE TAKE FURTHER NOTICE that this matter does not involve complicated issues of law or fact and therefore no brief is necessary; and

PLEASE TAKE FURTHER NOTICE that any opposition must be filed within 7 days of the hearing.

SCURA, WIGFIELD, HEYER & STEVENS LLP
Attorneys for Debtor, Ronnye & Rina Hurtado

/s/ John J. Scura III
John J. Scura III, Esq.

Dated: May 6, 2014

SERVICE LIST

U.S. Trustee's Office
One Newark Center, Suite 2100
Newark, NJ 07102

Ronnye & Rina Hurtado
148 Williams Ave.
Hasbrouck Heights, NJ 07604

Nancy Isaacson, Trustee
Greenbaum, Rowe, Smith & Davis LLP
75 Livingston Ave, Ste. 301
Roseland, NJ 07068-3701

Ralph Gulko, Esq.
Joseph Valenzuela, Esq.
Pressler & Pressler, LLP
7 Entin Road
Parsippany, NJ 07054-5020